



Natural Resources Conservation Service
675 U.S. Courthouse
801 Broadway
Nashville, Tennessee 37203

September 18, 2012

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TN Division of Water
Pollution Control

Ms. Erin O'Brien
Tennessee Department of Environment and Conservation
Division of Water Pollution Control
401 Church Street
6th Floor L&C Annex
Nashville, Tennessee 37243

RE: REQUEST FOR TDEC'S CONCURRENCE ON CONDITIONS WHERE RISK OF
PHOSPHORUS LOSS IS LOW

Dear Ms. O'Brien:

The Natural Resources Conservation Service in Tennessee (TN NRCS) has begun the process of revising the 590 Nutrient Management Conservation Practice Standard (CPS) for Tennessee. The 590 impacts all nutrient management planning for NRCS including the Comprehensive Nutrient Management Plans (CNMP). An eleven-member task force, with representation from the University of Tennessee (UT), Tennessee Department of Agriculture (TDA), TDEC, and NRCS State and Area staff, has been formed to update the standard.

Updating the Phosphorus Index is one of the group's objectives. This task has involved reviewing the Phosphorus Risk Assessment Criteria that allows setting conditions where the risk of phosphorus loss is low. NRCS National Policy Title 190 – National Instruction, Part 302 – Nutrient Management Policy Implementation states:

(3) A P-Index assessment shall not be required when the State NRCS, with concurrence of the State water quality control authority, has determined specific conditions where the risk of P loss to local water is low. Fields excluded from the P risk assessment must have a documented agronomic need for P based on soil test phosphorus (STP) and land-grant university nutrient management recommendations. States can use a prescreening tool to expedite the decision as to whether or not a P-Index is required.

(4) When the State-designated low risk condition is granted, producers are required to meet all other field-specific NRCS conservation objectives and standards, including erosion control, manure application setbacks, proper timing of manure application, and annual N limits for the crop. These conservation requirements apply to all nutrient applications independent of source in compliance with CPS Code 590, Nutrient Management.

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The task force has discussed the issue at length and recommends that the following conditions be set to determine when the risk of phosphorus loss is low and that all four of the conditions must be met on a per field basis:

1. Low or medium soil test phosphorus (STP) levels based on current soil test(s);
2. Slope is less than or equal to 5%;
3. Soil loss is less than or equal to the soil loss tolerance (T); and,
4. Nutrient application(s) shall not exceed UT recommendations.

For these conditions to be adopted as part of TN NRCS's 590 Nutrient Management CPS, we require TDEC's concurrence with our recommendations. Please let me know if the above conditions are acceptable for determining a low risk of phosphorus loss to local water. If these conditions are not adequate, please provide an explanation for the task force.

If you have any questions or require further assistance, please feel free to contact Pat Turman, State Agronomist, at (615) 893-9295, ext. 119 or at pat.turman@tn.usda.gov.

Thank you in advance for your assistance with the update of the 590 standard.

Sincerely,



CAROL CHANDLER
State Resource Conservationist

cc: Pat Turman, State Agronomist, NRCS, Murfreesboro, TN
Kelly Gupton, Agricultural Engineer, NRCS, Nashville, TN

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